no decision directly supporting the doctrine announced. It is a general principle that "executory contracts of a corporation become nugatory after it is forced into an involuntary liquidation and dissolution." *People* v. *Globe etc. Ins. Co.*, 91 N. Y. 174; *Griffith* v. *Blackwater Boom & Lumber Co.*, 46 W. Va. 56, 1 WILG. CAS. 897; *Malcomson* v. *Wappoo Mills*, 88 Fed. 680; *Spader* v. *Mural Decoration Mfg. Co.*, 47 N. J. Eq. 18. This is put on the ground that the continued existence of the corporation is assumed as the basis of the contract, and the latter ceases to be binding when there is no one left to perform it according to its terms. 1 AM & ENG. CORP. CAS. 586, 594n. However, if the corporation is dissolved voluntarily equity will not recognize its dissolution nor permit the distribution of its assets until its contracts are satisfied. *Tiffin Glass Co.* v. *Stoehr*, 54 Ohio St. 157; *Schleider* v. *Dielman*, 44 La. Ann 462. By the great weight of authority dissolution of an insurance corporation by order of court and the appointment of a receiver *ipso facto* cancels all policies issued by the company on which no loss has occurred at the time of such adjudication. *Todd* v. *German-American Ins. Co.*, 2 Ga. App. 789; 4 JOYCE, INSURANCE, § 3591; *Boston Ry. Co.* v. *Mercantile Trust Co.*, 82 Md. 535; 38 L. R. A. 97; *Doane* v. *Millville Ins. Co.*, 43 N. J. Eq. 522; *Commonwealth* v. *Mass. Fire Ins. Co.*, 119 Mass. 45; 3 COOLEY'S BRIEFS ON THE LAW OF INSURANCE, 2810; *Taylor* v. *North Star Mutual Insurance Co.*, 46 Minn. 198; *Reliance Lumber Co.* v. *Brown*, 4 Ind. App. 92; *Dean & Son's Appeal*, 98 Pa. St. 101; *Boyd* v. *Mutual Fire Ins. Assn.*, 116 Wis. 155; 10 CYC. 1329. The right of the insured to recover a ratable proportion of his paid premium is another question. 17 AM & ENG. ANN. CAS. 801. A dissenting opinion in the principal case contends for application of the doctrine referred to above as supported by the weight of authority.

LIBEL AND SLANDER—QUALIFIED PRIVILEGE—PRIEST AND CONGREGATION.—The defendant, a priest, uttered in a Sunday sermon, words actionable *per se* of a member of his congregation who held a public office. *Held*, the defendant's position gave him no qualified special privilege and if it had, such privilege would have been destroyed by the evident malicious character of the slander. *Hassett* v. *Carroll* (Conn. 1911), 81 Atl. 1013.

Good faith, and a substantial moral or legal duty, are the elemental requisites to make defamatory words qualifiedly privileged. *Coxhead* v. *Richards*, 2 C. B. 569; *Flanders* v. *Daley*, 120 Ga. 885, 48 S. E. 327; *Cameron* v. *Cockran*, 2 Marv. 166, 42 Atl. 454; *Bradley* v. *Heath*, 12 Pick. 163. Malice, sufficient to wipe out the privilege, may be inferred from the defamation, see note 6 L. R. A. 363; 12 L. R. A. (N.S.) 91; but falsity of the statement alone does not raise such inference. *Coogler* v. *Rhodes*, 38 Fla. 240, 21 South 109, 56 Am. St. Rep. 170. In the proper discharge of clerical and pastoral duties, a priest's slanderous words may well be privileged. *Servatius* v. *Pichel*, 34 Wis. 292; *Everett* v. *De Long*, 144 Ill. App. 496. But the principal case is not within this rule. The mere fact that a man is a minister of the gospel does not flavor all his remarks with sincere faith or a moral duty, nor make unlimited the extent of his "interest" in his parishioners. *Gilpin* v. *Fowler*, 9 Ex. 615, 23 L. J. Ex. 152, 18 Jur. 292. *Ritchie* v. *Widdemer*, 59 N. J. L. 290,

35 Atl. 825; *"The Count Joannes"* v. *Bennett,* 5 Allen 169; *Fitzgerald* v. *Robinson,* 112 Mass. 371. In general, neither from pulpit nor altar can slander be uttered without justification, even though the purpose is to reform an evildoer. ODGERS, SLANDER & LIBEL (1st Amer Ed.) p. 242; *Magrath* v. *Finn,* Ir. R. 11 C. L. 152. For not only must the occasion be privileged, but the interest or duty must be co-existent with the communication, NEWELL, DEFAMATION, p. 477; the defamatory matter must not exceed the exigency of the occasion. *Hines* v. *Shumaker,* 97 Miss, 669, 52 South 705; and even where there is a community of interest, the privilege is lost when the words are conveyed to too large a number. NEWELL, DEFAMATION, p. 529. Qualified privilege and fair comment often are discussed interchangeably. In truth, no identity exists and the distinction is clear. *Plymouth Society* v. *Traders' Pub. Co.,* [1906] 1 K. B. 403; *Burt* v. *Advertiser Newspaper Co.,* 154 Mass 238, 242, 28 N.E. 1, 13 L. R. A. 97. Privilege attaches to the occasion and the communicant, comment and criticism to the public character of the person or thing defamed. See 10 MICH L. REV. 351.

MASTER AND SERVANT—HOURS OF LABOR FOR WOMEN—CONSTITUTIONAL LAW.—Mass. Statutes 1909, Chap. 514, § 48, limiting the time during which women may be employed at labor in manufacturing and mechanical establishments to 56 hours a week and to 10 hours in each day, (with some exceptions), and providing that every employer shall post in a conspicuous place in every room where such persons are employed a printed notice stating the number of hours of work required of them in each day of the week, the hours of commencing and stopping work, and the hours when the time for meals begins and ends, etc., *Held,* constitutional. *Commonwealth* v. *Riley,* (Mass. 1912), 97 N. E. 367.

The court follows its decision rendered in 1876 upholding the constitutionality of a statute restricting the hours of employment of women and children in a single manufacturing service. *Com.* v. *Hamilton, Woolen Co.,* 120 Mass. 383. Similar acts have been recently upheld in the following cases: *Muller* v. *Oregon,* 208 U. S. 412. 28 Sup. Ct. 324, 52 L. Ed. 551, affirming *State* v. *Muller,* 48 Or. 252, 85 Pac. 855, 120 Am. St. Rep. 805; *Wenham* v. *State,* 65 Neb. 394, 91 N.W. 421, 58 L. R. A. 825; *State* v. *Buchanan,* 29 Wash. 602, 70 Pac. 52, 59 L. R. A. 342, 92 Am. St. Rep. 930; *Com* v. *Beatty,* 15 Pa. Super. Ct. 5, 17; *Withey* v. *Bloom,* 163 Mich. 419, 128 N.W. 913; *Ritchie* v. *Wayman,* 244 Ill. 509, 91 N.E. 695, 27 L. R. A. (N.S.) 994; *People* v. *Bowes-Allegretti Co.,* 244 Ill. 557, 91 N. E. 701. There are a few cases to the contrary but they seem to have been decided according to peculiar constitutional provisions of those States. *Burcher* v. *People,* 41 Colo. 495, 93 Pac. 14, 124 Am. St. Rep. 143; *Matter of Mary McGuire,* 57 Cal. 604, 40 Am. Rep. 125. The act does not apply to men so it is not within the principle of *Lochner* v. *New York,* 198 U. S. 45, 25 Sup. Ct. 539, 49 L. Ed. 937; and *Opinion of the Justices,* 208 Mass. 622, 94 N.E. 1044. A classification of women and children as to employment, confined to manufacturing and mechanical establishments is a reasonable one and a legitimate exercise of legislative power. *Com* v. *Hamilton,* 120 Mass. 383; *Griffith* v. *Connecticut,* 218 U. S. 563, 31 Sup. Ct. 132, 54 L. Ed. 1151.